

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

ANTHONY JUNAID

CASE O. 04-MJ-00481-RBC

ASSENTED-TO MOTION TO CONTINUE PROBABLE CAUSE HEARING

The United States, with the assent of the defendant, hereby moves the Court to continue the probable cause hearing in this matter, currently scheduled to be held on November 22, 2004, for approximately three weeks. As grounds, the government states as follows:

1. The parties are engaged in discussion concerning possible resolution of this matter;
2. To that end, the government is producing extensive pre-Indictment discovery, including hundreds of pages of documents being made available to the defendant today;
3. It is in the interest of both parties to permit the defendant an opportunity to review discovery before proceeding to a probable cause hearing; and
4. For these reasons, conducting a probable cause hearing at this time is not in the interest of fairness, efficiency, or judicial economy.

Wherefore, moves the Court to continue the probable cause hearing in this matter for approximately three weeks.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ John A. Capin

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